

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

Jessica Anderson)	
)	
Plaintiff,)	Case No. C-1-02-355
)	
vs.)	Judge Weber
)	
Avon Products, Inc.)	
)	
Defendant.)	

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION
OF THE DISPOSITIVE MOTION CUT OFF DEADLINE**

NOW COMES Defendant Avon Products, Inc., and for the reasons set forth in the attached Memorandum, requests an extension of the dispositive motion deadline in the above-referenced matter. Plaintiff does not oppose this Motion.

Respectfully submitted,

/s/ Jeffery L. VanWay
Ellen J. Garling (0043554)
Baker & Hostetler, LLP
Capitol Square, Suite 2100
65 East State Street
Columbus, Ohio 43215
(614) 228-1541

and

Jeffery L. VanWay (0069175)
Bryant L. Brewer (0072152)
BAKER & HOSTETLER, LLP
312 Walnut Street, Suite 3200
Cincinnati, Ohio 45202
(513) 929-3400
(513) 929-0303 – Fax
email: jvanway@bakerlaw.com

Trial Attorneys for Defendant

MEMORANDUM

The dispositive motion deadline is currently set for November 14, 2003. The trial is set for the March 2004 term. Counsel for Defendant completed the deposition of Plaintiff on Tuesday, October 21. Plaintiff's counsel also completed the depositions of two of Defendant's representatives at this same time. Defendant was late in getting the deposition transcripts for these depositions. Although Defendant's summary judgment motion is fully prepared and ready for filing, Defendant's duly authorized representative must review and authorize its filing with the Court. Defendant's duly authorized representative is out of the state and unavailable to provide this authorization until November 20, 2003. Because Defendant's duly authorized representative must review and authorize the filing of its summary judgment motion, Defendant requests a short extension of the motion cutoff date from November 14, 2003 to November 21, 2003.

Defendant has spoken to Plaintiff's counsel regarding this extension and has been advised that Plaintiff does not oppose this extension. Defendant does not anticipate that this extension will affect the trial date and this will be the final extension requested by Defendant.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This shall certify that a true copy of the foregoing was duly served upon Daniel A. Kruse, Attorney for Plaintiff, 1029 Main Street, Cincinnati, Ohio 45202, by regular U.S. mail, postage prepaid on this 14th day of November, 2003.

/s/ Jeffery VanWay
Jeffery VanWay

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